

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA
MDL No. 3076
CASE NO. 1:23-md-03076-KMM

IN RE:

FTX Cryptocurrency Exchange Collapse Litigation

THIS DOCUMENT RELATES TO ALL ACTIONS

/

PLAINTIFFS' NOTICE ON PERSONAL JURISDICTION

In accordance with this Court's Order, Co-Lead Counsel for the Plaintiffs write to advise the Court as to how personal jurisdiction objections have been resolved. [ECF No. 61], ("All issues related to personal jurisdiction shall be resolved and the Parties shall inform the Court of such resolution within 14 days of the date of this Order.").

Defendant Fenwick & West has agreed to waive its personal jurisdiction defense. See [ECF No. 86]. Similarly, Defendant Shohei Ohtani has agreed to waive personal jurisdiction arguments regarding Mr. Ohtani for purposes of this litigation only, and Mr. Ohtani agrees to be subject to personal jurisdiction in the Southern District of Florida, again solely for purposes of this litigation. Subject to the Court denying an anticipated motion to stay discovery, Mr. Ohtani also agrees to sit for deposition after the end of the MLB playoffs season, which ends November 4th, 2023, on a mutually convenient date just before Thanksgiving, and to produce responsive documents to Plaintiffs in accordance with the deadline to do so in response to Plaintiffs' document requests.

Defendants Naomi Osaka [ECF No. 87], Golden State Warriors [ECF No. 87], Tom Nash [ECF No. 88], Andrei Jikh [ECF No. 89], Jeremy Lefebvre [ECF No. 89], Graham Stephan [ECF No. 89], Jaspreet Singh [ECF No. 90], Erika Kullberg [ECF No. 91], Brian Jung [ECF No. 91],

Creators Agency [ECF No. 91], Steph Curry [ECF No. 92], Lawrence Gene David [ECF No. 93], Ben Armstrong [ECF No. 94], Farmington State Bank [ECF No. 95], Sequoia Capital Operations, LLC [ECF No. 96], Altimeter Capital Management, LP [ECF No. 96], Deltec Bank and Trust Company Limited [ECF No. 96], Jean Chalopin [ECF No. 96], Multicoin Capital Management LLC [ECF No. 96], Paradigm Operations, LP [ECF No. 96], Ribbit Capital, L.P. [ECF No. 96], Temasek Holdings (Private) Limited [ECF No. 96], Thoma Bravo, LP [ECF No. 96], and Tiger Global Management LLC [ECF No. 96] have not agreed to waive their personal jurisdiction defense.

Thus far, only counsel for Defendants Andrei Jikh, Jeremy Lefebvre, and Graham Stephan have agreed to accept service of those complaints in the Defendants' home jurisdictions. Plaintiffs hope to reach agreement with additional Defendants with regards to service.

Plaintiffs are working expeditiously to draft those complaints, and to obtain local counsel where needed to file.

Dated: July 5, 2023

By: s/ Adam M. Moskowitz

Adam M. Moskowitz
Joseph M. Kaye
The Moskowitz Law Firm, PLLC
Continental Plaza
3250 Mary Street, Suite 202
Miami, FL 33133
Mailing Address:
P.O. Box 653409
Miami, FL 33175
Office: (305) 740-1423
adam@moskowitz-law.com
joseph@moskowitz-law.com
service@moskowitz-law.com

Respectfully submitted,

By: s/ David Boies

David Boies
Alexander Boies
Brooke A. Alexander
Boies Schiller Flexner LLP
333 Main Street
Armonk, NY 10504
914-749-8200
dboies@bsflp.com
aboies@bsflp.com
balexander@bsflp.com

Stephen N. Zack
Tyler Evan Ulrich
Boies Schiller & Flexner
100 SE 2nd Street
Suite 2800, Miami Tower
Miami, FL 33131-2144

305-539-8400
305-539-1307
szack@bsflp.com
tulrich@bsflp.com

CERTIFICATE OF SERVICE

I hereby certify that on July 5, 2023, I electronically served the foregoing with the Clerk of Court using the CM/ECF System which will send an electronic notification of such filing to all counsel of record in the Court's ECF filing system.

By: /s/ Adam M. Moskowitz
Adam M. Moskowitz